

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

ORDER GRANTING FIVE HUNDRED THIRTIETH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO PARTIAL DUPLICATE, DEFICIENT, NO  
LIABILITY, AND INCORRECT DEBTOR BOND CLAIMS

Upon the *Five Hundred Thirtieth Omnibus Objection (Substantive) of the  
Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the  
Commonwealth of Puerto Rico to Partially Duplicate, Deficient, No Liability, and Incorrect  
Debtor Bond Claims* [ECF No. 22263] (“Five Hundred Thirtieth Omnibus Objection”)<sup>2</sup> filed by

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Thirtieth Omnibus Objection.

the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated September 16, 2022, for entry of an order partially disallowing and partially reclassifying certain claims filed against the Debtors, as more fully set forth in the Five Hundred Thirtieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Thirtieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Five Hundred Thirtieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in Exhibit A to the Five Hundred Thirtieth Omnibus Objection (the “Claims to Be Partially Disallowed and Partially Reclassified”) seek recovery, in part, of amounts for which the Debtors are not liable; and the Court having determined that certain of the Claims to Be Partially Disallowed and Partially Reclassified should be partially reclassified because a portion of the claim identifies the Commonwealth as obligor, when that portion of the claim is properly asserted, if at all, against PREPA; and the Court having determined that the relief sought in the Five Hundred Thirtieth Omnibus Objection is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Thirtieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Five Hundred Thirtieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the portions of the claims identified in Exhibit A to the Five Hundred Thirtieth Omnibus Objection (the “Claims to Be Partially Disallowed”) are hereby reduced and disallowed, respectively; and it is further

ORDERED that Kroll is authorized and directed to designate as expunged and reduce the amount asserted in the Claims to Be Partially Disallowed by the disallowed portions from the official claims register in the Commonwealth Title III Case; and it is further

ORDERED that the portions of the claims identified in the column titled “Asserted” in Exhibit A to the Five Hundred Thirtieth Omnibus Objection (the “Partially Reclassified Bond Claims”) are hereby reclassified to be claims asserted against PREPA, as indicated in the column titled “Modified and/or Expunged by Plan” in Exhibit A; and it is further

ORDERED that the Debtors’ right to object to the Partially Reclassified Bond Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed, in the official claims register in the PROMESA cases, to move the claims identified in the column titled “Asserted” in Exhibit A to the Five Hundred Thirtieth Omnibus Objection from the Title III case for the debtor(s) identified in the column titled “Asserted” in Exhibit A to the Five Hundred Thirtieth Omnibus Objection to PREPA’s Title III Case (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747)); and it is further

ORDERED that this Order resolves Docket Entry No. 22263 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Five Hundred Thirtieth Omnibus Objection**

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1 ACP MASTER, LTD. C/O AURELIUS CAPITAL MANAGEMENT, LP ATTN: DAN GROPPER 535 MADISON AVENUE, 22ND FLOOR NEW YORK, NY 10022	65801	Commonwealth of Puerto Rico	Admin	Undetermined*	Commonwealth of Puerto Rico	Admin	Undetermined*
		Commonwealth of Puerto Rico	Secured	\$16,939,584.42*	Commonwealth of Puerto Rico	Secured	\$2,717,582.82*
			Subtotal	\$16,939,584.42*		Subtotal	\$2,717,582.82*

Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority and the Puerto Rico Ports Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Convention Center District Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

The remaining bonds claimed are all expunged per Plan.

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
2 AURELIUS CAPITAL MASTER, LTD. C/O AURELIUS CAPITAL MANAGEMENT, LP ATTN: DAN GROPPER 535 MADISON AVENUE, 22ND FLOOR NEW YORK, NY 10022	66514	Commonwealth of Puerto Rico	Admin	Undetermined*	Commonwealth of Puerto Rico	Admin	Undetermined*
		Commonwealth of Puerto Rico	Secured	\$174,177,106.37*	Commonwealth of Puerto Rico	Secured	\$85,361,256.06*
			Subtotal	\$174,177,106.37*		Subtotal	\$85,361,256.06*

Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. Claimant also asserts, in part, secondarily insured notes whose original CUSIP numbers are associated with one or more bonds issued by HTA that are duplicative of one or more Master Proofs of Claim which were filed in the HTA Title III Case by the fiscal agent or trustee of these bond(s). In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority and the Puerto Rico Ports Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Convention Center District Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

The remaining bonds claimed are all expunged per Plan.



## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
3	COOPERATIVA A/C LA COMERIENA PO BOX 289 COMERIO, PR 00782-0289	12702	Commonwealth of Puerto Rico	Secured	\$2,543,853.00	Commonwealth of Puerto Rico	Secured	\$5,000.00
<p>Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Industrial Development Company which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case.</p> <p>Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Public Finance Corporation which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case.</p> <p>Proof of claim also seeks recovery, in part, for amounts for which the Commonwealth is not liable because it asserts interests in note(s) that does not constitute a debt of the Commonwealth and are associated with an entity, The Puerto Rico Public Finance Corporation, that is not a Title III Debtor.</p> <p>Claimant also asserts, in part, liability based on an alleged ownership of GDB Bonds that were subject to the Qualifying Modification, which provided for the issuance of new securities in exchange for the cancellation of the GDB Bonds and the extinguishment of the Commonwealth's guarantee of certain GDB Bonds, and thus the Commonwealth is no longer liable for these claims.</p> <p>The remaining bonds claimed are all expunged per Plan.</p>								
4	COOPERATIVA DE AHORRO Y CREDITO DE OFICIALES DE CUSTODIA DE PR ATTN. EPIFANIO TORRES URB. REPARTO METROPOLITANO 1100 CALLE 54 SE SAN JUAN, PR 00921-2731	53610	Commonwealth of Puerto Rico	Secured	\$633,865.11	Commonwealth of Puerto Rico	Secured	\$281,465.73
<p>Reason: Proof of claim seeks, in part, recovery for amounts for which the Commonwealth is not liable because it assert interests in note(s) for which bondholders have been receiving their payments in full, do not constitute a debt of the Commonwealth, and are associated with an entity, The Puerto Rico Aqueducts and Sewers Authority, that is not a Title III Debtor. Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Public Finance Corporation which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case.</p> <p>The remaining bonds claimed are all expunged per Plan.</p>								

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
5	COOPERATIVA DE AHORRO Y CREDITO NAGUABEÑA ATTN. AXEL SANTIAGO URB. JUAN MENDOZA CALLE 3 B1 PO BOX 69 NAGUABO, PR 00718	37753	Commonwealth of Puerto Rico	Secured	\$533,365.09	Commonwealth of Puerto Rico	Secured	\$70,000.00

Reason: Claimant asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Public Finance Corporation which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case.

The remaining bonds claimed are all expunged per Plan.

6	ENUDIO NEGRÓN ANGULO RETIREMENT PLAN, REPRESENTED BY UBS TRUST COMPANY OF PUERTO RICO JAVIER GONZÁLEZ UBS TRUST COMPANY OF PUERTO RICO 250 MUÑOZ RIVERA AVENUE 10TH FLOOR SAN JUAN, PR 00918	39310	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Secured	\$110,000.00*	Employees Retirement System of the Government of the Commonwealth of Puerto Rico Puerto Rico Electric Power Authority	Secured Secured	\$50,000.00* \$60,000.00*
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Reason: Claimant identifies, in part, obligor as the Commonwealth of Puerto Rico when the proof of claim, supporting documentation, bond name(s) at issue, and/or the CUSIP information show that any liability would reside, if at all, under Puerto Rico Electric Power Authority.

The remaining bonds claimed are all expunged per Plan.

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
7	FIDEICOMISO FLORES MORALES, REPRESENTED BY UBS TRUST COMPANY OF PR UBS TRUST COMPANY OF PUERTO RICO ATTN: JAVIER GONZÁLEZ 250 MUÑOZ RIVERA AVENUE, 10TH FLOOR SAN JUAN, PR 00918	39039	Commonwealth of Puerto Rico	Secured	\$130,000.00*	Commonwealth of Puerto Rico	Secured	\$80,000.00*
Reason: Claimant asserts, in part, liability associated with bond(s) issued by the Puerto Rico Electric Power Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. The remaining bonds claimed are all expunged per Plan.								
8	FIDEICOMISO FLORES MORALES, REPRESENTED BY UBS TRUST COMPANY OF PUERTO RICO JAVIER GONZÁLEZ 250 MUÑOZ RIVERA AVENUE 10TH FLOOR SAN JUAN, PR 00918	34466	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Secured	\$130,000.00*	Employees Retirement System of the Government of the Commonwealth of Puerto Rico Puerto Rico Electric Power Authority	Secured Secured	\$80,000.00* \$50,000.00*
Reason: Claimant identifies, in part, obligor as the Commonwealth of Puerto Rico when the proof of claim, supporting documentation, bond name(s) at issue, and/or the CUSIP information show that any liability would reside, if at all, under Puerto Rico Electric Power Authority. The remaining bonds claimed are all expunged per Plan.								

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NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
9 MCP HOLDINGS MASTER LP C/O MONARCH ALTERNATIVE CAPITAL LP ATTN: MICHAEL KELLY 535 MADISON AVENUE, 26TH FLOOR NEW YORK, NY 10022	66618	Commonwealth of Puerto Rico	Admin	Undetermined*	Commonwealth of Puerto Rico	Admin	Undetermined*
		Commonwealth of Puerto Rico	Secured	\$68,740,756.47*	Commonwealth of Puerto Rico	Secured	\$53,875,053.26*
			Subtotal	\$68,740,756.47*		Subtotal	\$53,875,053.26*

Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Convention Center District Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

The remaining bonds claimed are all expunged per Plan.

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
10	MONARCH ALTERNATIVE SOLUTIONS MASTER FUND LTD. C/O MONARCH ALTERNATIVE CAPITAL LP ATTN: MICHAEL KELLY 535 MADISON AVENUE, 26TH FLOOR NEW YORK, NY 10022	66512	Commonwealth of Puerto Rico	Admin	Undetermined*	Commonwealth of Puerto Rico	Admin	Undetermined*
			Commonwealth of Puerto Rico	Secured	\$8,717,576.75*	Commonwealth of Puerto Rico	Secured	\$1,654,995.79*
				Subtotal	\$8,717,576.75*		Subtotal	\$1,654,995.79*

Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Convention Center District Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

The remaining bonds claimed are all expunged per Plan.

## Five Hundred Thirtieth Omnibus Objection

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	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
11	MONARCH CAPITAL	66444	Commonwealth of Puerto Rico	Admin	Undetermined*	Commonwealth of Puerto Rico	Admin	Undetermined*
	MASTER PARTNERS III LP		Commonwealth of Puerto Rico	Secured	\$101,934,423.77*	Commonwealth of Puerto Rico	Secured	\$72,841,472.62*
	C/O MONARCH							
	ALTERNATIVE CAPITAL LP			Subtotal	\$101,934,423.77*		Subtotal	\$72,841,472.62*
	ATTN: MICHAEL KELLY							
	535 MADISON AVENUE,							
	26TH FLOOR							
	NEW YORK, NY 10022							

Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Convention Center District Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

The remaining bonds claimed are all expunged per Plan.

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
12	MONARCH CAPITAL	66487	Commonwealth of Puerto Rico	Admin	Undetermined*	Commonwealth of Puerto Rico	Admin	Undetermined*
	MASTER PARTNERS IV LP		Commonwealth of Puerto Rico	Secured	\$82,555,834.27*	Commonwealth of Puerto Rico	Secured	\$49,334,344.46*
	C/O MONARCH							
	ALTERNATIVE CAPITAL LP			Subtotal	\$82,555,834.27*		Subtotal	\$49,334,344.46*
	ATTN: MICHAEL KELLY							
	535 MADISON AVENUE,							
	26TH FLOOR							
	NEW YORK, NY 10022							

Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, secondarily insured notes whose original CUSIP numbers are associated with one or more bonds issued by HTA that are duplicative of one or more Master Proofs of Claim which were filed in the HTA Title III Case by the fiscal agent or trustee of these bond(s). In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority and the Puerto Rico Ports Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Convention Center District Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

The remaining bonds claimed are all expunged per Plan.

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
13	MONARCH DEBT	66406	Commonwealth of Puerto Rico	Admin	Undetermined*	Commonwealth of Puerto Rico	Admin	Undetermined*
	RECOVERY MASTER FUND		Commonwealth of Puerto Rico	Secured	\$154,610,921.09*	Commonwealth of Puerto Rico	Secured	\$132,733,983.98*
	LTD							
	C/O MONARCH			Subtotal	\$154,610,921.09*		Subtotal	\$132,733,983.98*
	ALTERNATIVE CAPITAL LP							
	ATTN: MICHAEL KELLY							
	535 MADISON AVENUE,							
	26TH FLOOR							
	NEW YORK, NY 10022							

Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Convention Center District Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Aqueduct and Sewer Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case.

The remaining bonds claimed are all expunged per Plan.

14	MONARCH DEBT	66460	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Admin	Undetermined*	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Admin	Undetermined*
	RECOVERY MASTER FUND		Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Secured	\$133,598,050.73*	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Secured	\$132,733,983.98*
	LTD							
	C/O MONARCH			Subtotal	\$133,598,050.73*		Subtotal	\$132,733,983.98*
	ALTERNATIVE CAPITAL LP							
	ATTN: MICHAEL KELLY							
	535 MADISON AVENUE,							
	26TH FLOOR							
	NEW YORK, NY 10022							

Reason: Proof of claim seeks recovery for amounts for which ERS is not liable because it assert interests in note(s) for which bondholders have been receiving their payments in full, do not constitute a debt of ERS, and are associated with an entity, The Puerto Rico Aqueducts and Sewers Authority, that is not a Title III Debtor.

The remaining bonds claimed are all expunged per Plan.



## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
15 MONARCH SPECIAL OPPORTUNITIES MASTER FUND LTD. C/O MONARCH ALTERNATIVE CAPITAL LP ATTN: MICHAEL KELLY 535 MADISON AVENUE, 26TH FLOOR NEW YORK, NY 10022	66364	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Admin	Undetermined*	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Admin	Undetermined*
		Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Secured	\$55,159,385.01*	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Secured	\$54,969,480.23*
			Subtotal	\$55,159,385.01*		Subtotal	\$54,969,480.23*

Reason: Proof of claim seeks recovery for amounts for which ERS is not liable because it assert interests in note(s) for which bondholders have been receiving their payments in full, do not constitute a debt of ERS, and are associated with an entity, The Puerto Rico Aqueducts and Sewers Authority, that is not a Title III Debtor.

The remaining bonds claimed are all expunged per Plan.

16 MONARCH SPECIAL OPPORTUNITIES MASTER FUND LTD. C/O MONARCH ALTERNATIVE CAPITAL LP ATTN: MICHAEL KELLY 535 MADISON AVENUE, 26TH FLOOR NEW YORK, NY 10022	66394	Commonwealth of Puerto Rico	Admin	Undetermined*	Commonwealth of Puerto Rico	Admin	Undetermined*
		Commonwealth of Puerto Rico	Secured	\$66,204,941.69*	Commonwealth of Puerto Rico	Secured	\$54,969,480.22*
			Subtotal	\$66,204,941.69*		Subtotal	\$54,969,480.22*

Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by HTA, which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Convention Center District Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan.

Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Aqueduct and Sewer Authority which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case.

The remaining bonds claimed are all expunged per Plan.

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
17	MORO ROMERO, JULIO PO BOX 1520 MOCA, PR 00676	16715	Commonwealth of Puerto Rico	Secured	\$1,000,000.00*	Commonwealth of Puerto Rico	Secured	Undetermined*
<p>Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Public Finance Corporation which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case.</p> <p>Claimant also asserts, in part, liability based on an alleged ownership of GDB Bonds that were subject to the Qualifying Modification, which provided for the issuance of new securities in exchange for the cancellation of the GDB Bonds and the extinguishment of the Commonwealth's guarantee of certain GDB Bonds, and thus the Commonwealth is no longer liable for these claims.</p> <p>Proof of claim also seeks recovery, in part, for amounts for which the Commonwealth is not liable because it assert interests in note(s) for which bondholders have been receiving their payments in full, do not constitute a debt of the Commonwealth, and are associated with an entity, The Puerto Rico Aqueducts and Sewers Authority, that is not a Title III Debtor.</p> <p>Claimant also asserts, in part, investments in one or more mutual funds that in turn may have invested in bonds issued by the Commonwealth. The claim thus seeks recovery for an amount for which the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth and lacks standing to assert this derivative claim.</p> <p>Claim also purports to assert, in part, liability based on an alleged ownership of COFINA Bonds, and thus seeks recovery for amounts for which the Commonwealth of Puerto Rico is not liable because the claims were (1) compromised and settled pursuant to the Settlement Order, and (2) released and discharged in accordance with the Plan and Amended Confirmation Order.</p> <p>The remaining bonds claimed are all expunged per Plan.</p>								
18	RADAMES MUNIZ AND EMMA M. DE MUNIZ ADSUAR MUÑIZ GOYCO SEDA & PEREZ-OCHOA, P.S.C. P O BOX 70294 SAN JUAN, PR 00936-8294	32883	Commonwealth of Puerto Rico	Secured	\$856,976.00	Commonwealth of Puerto Rico	Secured	\$694,526.00
<p>Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Public Finance Corporation which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case.</p> <p>The remaining bonds claimed are all expunged per Plan.</p>								

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
19	RHODES, DAVID 214 EAST 21ST STREET NEW YORK, NY 10010	7276	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Unsecured	\$450,000.00*	Employees Retirement System of the Government of the Commonwealth of Puerto Rico Puerto Rico Electric Power Authority	Unsecured Unsecured	\$200,000.00* \$100,000.00*
Reason: Claimant purports to assert, in part, liability associated with bond(s) issued by PRIFA, however the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also identifies, in part, obligor as the Commonwealth of Puerto Rico when the proof of claim, supporting documentation, bond name(s) at issue, and/or the CUSIP information show that any liability would reside, if at all, under Puerto Rico Electric Power Authority. The remaining bonds claimed are all expunged per Plan.								
20	RHODES, DAVID 214 EAST 21ST STREET NEW YORK, NY 10010	7787	Commonwealth of Puerto Rico	Unsecured	\$450,000.00*	Commonwealth of Puerto Rico	Unsecured	\$200,000.00*
Reason: Claimant asserts, in part, liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority and the Puerto Rico Ports Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. In addition, the Confirmation Order provides for discharge and no further liability with respect to such claims other than as provided in the Plan. Claimant also asserts, in part, liability associated with bond(s) issued by the Puerto Rico Electric Power Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. The remaining bonds claimed are all expunged per Plan.								
21	THE NILDA E. ORTIZ MELÉNDEZ RETIREMENT PLAN, REPRESENTED BY UBS TRUST COMPANY OF PUERTO RICO JAVIER GONZÁLEZ UBS TRUST COMPANY OF PUERTO RICO 250 MUÑOZ RIVERA AVENUE 10TH FLOOR SAN JUAN, PR 00918	34630	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Secured	\$45,000.00*	Employees Retirement System of the Government of the Commonwealth of Puerto Rico Puerto Rico Electric Power Authority	Secured Secured	\$40,000.00* \$5,000.00*
Reason: Claimant identifies, in part, obligor as the Commonwealth of Puerto Rico when the proof of claim, supporting documentation, bond name(s) at issue, and/or the CUSIP information show that any liability would reside, if at all, under Puerto Rico Electric Power Authority. The remaining bonds claimed are all expunged per Plan.								

## Five Hundred Thirtieth Omnibus Objection

## Exhibit A - Claims to Be Partially Disallowed and Partially Reclassified, Remainder Expunged Per Plan

ASSERTEDMODIFIED AND/OR EXPUNGED BY PLAN

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
22	THE NILDA E. ORTIZ MELÉNDEZ RETIREMENT PLAN, REPRESENTED BY UBS TRUST COMPANY OF PUERTO RICO JAVIER GONZÁLEZ UBS TRUST COMPANY OF PUERTO RICO 250 MUÑOZ RIVERA AVENUE 10TH FLOOR SAN JUAN, PR 00918	41689	Commonwealth of Puerto Rico	Secured	\$45,000.00*	Commonwealth of Puerto Rico	Secured	\$40,000.00*
Reason: Claimant asserts, in part, liability associated with bond(s) issued by the Puerto Rico Electric Power Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case. The remaining bonds claimed are all expunged per Plan.								
23	VALDES LLAUGER, EDWARD 1360 CALLE LUCHETTI APT. NO.5 SAN JUAN, PR 00907	74572	Commonwealth of Puerto Rico	Secured	\$2,875,000.00*	Commonwealth of Puerto Rico	Secured	\$2,060,000.00*
Reason: Claimant asserts, in part, liability based on an alleged ownership of GDB Bonds that were subject to the Qualifying Modification, which provided for the issuance of new securities in exchange for the cancellation of the GDB Bonds and the extinguishment of the Commonwealth's guarantee of certain GDB Bonds, and thus the Commonwealth is no longer liable for these claims. Claimant also purports to assert, in part, liability associated with bond(s) issued by the Puerto Rico Public Finance Corporation which are duplicative of the master proof(s) of claim filed by the trustee of these bond(s) in the Commonwealth case. The remaining bonds claimed are all expunged per Plan.								